

CSM Legal, P.C.
Employment and Litigation Attorneys

60 E 42nd Street, Suite 4510
New York, New York 10165

Telephone: (212) 317-1200
Facsimile: (212) 317-1620

March 24, 2022

VIA ECF

Honorable Alison J. Nathan
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Felipe Galindo, et al v. Yummy Foods Deli Corp., et al
Index No.: 21-cv-00045 (AJN) (SLC)

Your Honor:

Our office represents Plaintiffs in the above-referenced action. I write to respectfully request the Court to permit Plaintiffs to move for a default judgment against the Individual Defendants in this action.

On January 21, 2022, Your Honor issued an order relieving defense counsel as attorneys and staying the within action for sixty (60) days to allow Defendants to obtain new counsel and for that new counsel to file a Notice of Appearance. Your Honor's order further stated that if new counsel did not appear on behalf of Defendant Yummy Foods Deli Corp. at the end of this sixty (60) day period, then Plaintiffs could file a motion for default. The sixty (60) day period has now expired. As such, our office is in the process of filing a proposed Certificate of Default as to Defendant Yummy Foods Deli Corp.

Since the sixty (60) day period has lapsed and new counsel has not appeared on behalf of the Individual Defendants as well, the undersigned respectfully requests that the Court also permit Plaintiffs to move for a default judgment against the Individual Defendants.

Plaintiffs thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ William K. Oates
William K. Oates, Esq.
CSM LEGAL, P.C.
Attorneys for Plaintiffs